

Case 1:07-cv-06481-PKL
USDC SDNY
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MEMBER OF NEW YORK &
LOUISIANA BARS

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PETER K. LEISURE
JUDGE

March 4, 2008

BY HAND

Honorable Peter K. Leisure
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

JOINT APPLICATION

Re: Access Business Group, et al.
v. Burlington Northern Santa Fe Railway Company, et al.
07 Civ. 6481 (PKL)
Our File: 7R-1524

Dear Judge Leisure:

I represent the plaintiffs. With the consent of defense counsel this joint application is respectfully submitted to request that the motion deadlines set at the last court conference be rescheduled. The reason for this application is that a settlement conference is scheduled before Magistrate Judge Dolinger on March 18, 2008. Counsel believe that pending completion of the settlement conference it makes sense to defer motion practice. With this in mind counsel join in respectfully requesting that the motion and admission response deadlines be reset as follows:

March 28, 2008.....Defendants' Transfer Motion
April 4, 2008.....Defendants' Response to Plaintiffs' Admission Requests
April 18, 2008.....Plaintiffs' Opposition and Cross-Motion
May 2, 2008.....Defendants' Reply and Opposition
May 12, 2008.....Plaintiffs' Reply

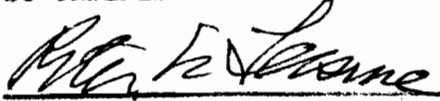
The Court's attention is appreciated.

Respectfully submitted,


David L. Mazaroli

cc: Landman Corsi Ballaine & Ford P.C.
Attn.: Arjay G. Yao, Esq. (Via e-mail: ayao@lcbf.com)

3/06/08
SO ORDERED


USDJ